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Attorney for Defendant
YURI KHATCHIKYAN

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

YURI KHACHIKYAN,

Defendants.

Case No. 2:24-cr-00214-MEMF

**DEFENDANT'S NOTICE OF
ERRATA**

Undersigned counsel respectfully requests that the prior motion for bond relief be corrected due to two errors. Counsel would ask that the two errors be corrected for the record and for further proceedings.

On May 13, 2024, counsel filed a motion for bond review for defendant Yuri Khachikyan. The bond motion went into great detail about the defendant's background and his criminal history.

1 Unfortunately, due to the need to have the hearing as soon as possible and
2 because the defendant was in custody, they had very little chance for contact or
3 communication. What little communication they had, was difficult to understand.
4 Thus, counsel had to rely on third parties and what few public documents that were
5 available at the time. Because of that, counsel misunderstood two events and
6 actually combined them together incorrectly. The groups responsible were also
7 identified incorrectly.
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9 The summary of the appeal of the trial referenced in the motion demonstrated
10 to counsel that he had written the events wrong. When he received the appeal
11 summary, counsel wanted to correct the record because in the future, if the defendant
12 is sentenced, counsel does not want the information in the PSR to be incorrect.
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14 Counsel stated in the motion that he was stabbed because he was a DEA
15 informant and that he was a victim of the Mexican Mafia. That was incorrect. It
16 should have read that a rumor was started against Khatchikyan that he was a police
17 informant and that he was helping to put away drug dealers. The rumor may have
18 actually started with the police as they were trying to get Khatchikyan's cooperation
19 in the first attempt on his life. Khatchikyan has always maintained, and adamantly
20 maintains today, that he was never an informant. But once labeled as that, he was in
21 danger for his life and has been forced to try and protect himself.
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23 In fact, the opposite has always been true, he refused to inform, even after he
24 was later attacked and could have cooperated in order to prevent having to do prison
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1 time. Instead, as counsel wrote in the motion, he refused to cooperate and ended up
2 serving nine years in prison. He was repeatedly hassled by police to give them
3 names but he refused. In short, he could have been an informant and served a lot less
4 time or perhaps no time, but he refused to cooperate.
5

6 Secondly, it was stated that he was stabbed by two Mexican Mafia members.
7 That was not the case. Counsel has now reviewed the case (unfortunately he did not
8 receive it until after the hearing), and it was not a stabbing, but a shooting (The later
9 case was an attempted stabbing which is where the confusion came in). The
10 shooting was not Mexican Mafia, but two young men who were Armenian, and who
11 were eventually put on trial for attempted murder. (See Exhibit #1 – summary of
12 appeal). The Mexican Mafia was not involved at all, and counsel can now see that
13 from the summary of appeal. The problem arose when counsel was attempting to
14 talk with Khatchikyan and counsel was confused over who was pursuing him.
15 Counsel thought he was referring to the Mexican Mafia when in fact he was referring
16 to a different group that has been looking to attack him. It was never the Mexican
17 Mafia involved but a different group of people who were pursuing him. It was that
18 group that attacked him in 2012 and who were the people he stabbed. They were
19 Armenian not Mexican Mafia which the police records reflect. (Exhibit #2 –
20 Glendale police report).
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26 In addition, Khatchikyan, even though he was shot, refused to testify or
27 identify the shooter. In fact, he was so adamant that he would not testify that the
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1 Glendale Police Department actually violated his probation and kept him in jail for
2 eleven months from June 7, 2007 until May 6, 2008 to try and pressure him into
3 cooperating. They also told him they would tell people he was cooperating even if
4 he was not. Eventually, that is what happened, and he has had to protect himself
5 ever since.
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8 Counsel apologizes for the confusion. As the Court is aware, it is very
9 difficult for counsel to see an inmate who is at a distant location, where there are no
10 attorney rooms. It is very hard to have any kind of conversation where the parties
11 can hear and understand each other, especially with other people talking on phones
12 nearby.
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14 These corrections are important to set the record straight and are backed up by
15 the attached exhibits that counsel now has. At some point, if the defendant pleads,
16 there will be a PSR provided to the Court for sentencing and the information needs to
17 be accurate to make sure the Court understands the correct history.
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22 Dated: May 19, 2024

s/ Pat Harris
PAT HARRIS
ATTORNEY FOR
YURI KHATCHIKYAN